EXECUTIVE SUMMARY

This report presents the findings from a three-year study of the JTPA Title IV Section 401 Indian and Native American (INA) Program. The program is designed to deliver employment and training services to Indians and Native Americans throughout the nation, through a network of grantees that includes tribal governments and other Indian organizations. The study was designed to examine the goals and objectives programs have established for themselves, the service design decisions that resulted, constraints and challenges in implementation, and the overall quality and effectiveness of the services in meeting the needs of participants and communities.

BACKGROUND OF THE EVALUATION

The very unique historical, socio-economic, and cultural context of Native American communities has provided ample justification for a specially-targeted program under JTPA, and under JTPA's successor, the recently enacted Workforce Investment Act (WIA) of 1998. These unique circumstances include extraordinarily high rates of joblessness and discrimination directed against Native Americans, even in the face of America's recent robust economy; the importance of tribal sovereignty that should give Native American grantees a greater measure of discretion in running their programs; unique cultural values and a sense of shared identity that provide meaning to Indians' lives; and tribal areas that are often physically remote, with incomplete infrastructures, and very limited labor markets.

In this context, Section 401 of JTPA calls for a specially-targeted program for serving the Indian and Native American population. With annual funding currently at about $50 million, the program serves approximately 19,000 participants each year through a network of about 175 grantees that includes tribal governments, tribal consortia, non-tribal Native American organizations, and, sometimes, agents of state governments. These grantees vary greatly in size and in the contexts in which they operate, and include programs with very limited JTPA funding serving narrowly circumscribed service areas, as well as organizations receiving hundreds of thousands or millions of dollars in annual funding and serving vast sweeping reservations, large metropolitan areas, or even entire states. Taken together, these grantees are responsible for providing services to eligible Indians and Native Americans throughout the United States.

To guide our study of the INA program and provide a framework for the evaluation, we developed a heuristic model of service quality. This model depicts how clients flow through the system and shows the quality indicators for each step in the process. The model suggests that programs need to provide, either directly or through their service providers: effective outreach and recruitment mechanisms, so that all eligible persons who are interested in services can have access (within the constraints of available funding); an initial assessment that is appropriate to the clients' needs and purposes and identifies barriers to successful participation; effective matching to services and case management to ensure that clients are assigned to appropriate services and receive the support they need to see that their service plan is successfully carried out; training that is of the highest quality, including well-specified and individualized learning objectives and contextualized instruction using active learning methods; and training assistance that, to the extent that opportunities in the local area allow, promote high quality job placements and build on skills that were attained. Outcomes need to include, for the participant, the opportunity to learn new skills, improved self-esteem, exposure to the labor market, increased employability, and the advancement of both short-term and longer-term career and other objectives. Community-level outcomes are also of paramount concern to INA grantees, including efforts to improve local services and build capacity for Native American communities and promote a strong sense of culture and community identity.

STUDY DESIGN

The evaluation consisted of two primary components. The first of these was a mail Administrator Survey sent to all grantees. The survey instrument was developed in close consultation with representatives of the grantee community, the U.S. Department of Labor (DOL), and the Office of Management and Budget, and included sections on program goals and objectives; perceived obstacles to obtaining successful outcomes for participants; and an assessment of the nature of relations with the Department of Labor, including grantees' appraisal of the clarity of DOL's guidance, the adequacy of the consultation process and the training and technical assistance that is provided, satisfaction with performance standards and reporting requirements, and so on. Survey administration began in early 1998 and extended through the spring of that year. In addition to asking grantees to provide responses in close-ended categories, we also provided them with the opportunity to write in their thoughts on a wide range of topics. Altogether, we received completed returns from 113 grantees, for a response

rate of about 70%. We were gratified to see that almost all respondents took the time to write extensive comments throughout all sections of the survey.

The second and much more elaborate of the evaluation's two components consisted of site visits to 23 randomly selected grantees across the country. The purpose of these case studies was to complement the Administrator Survey by gaining in-depth knowledge about a subset of grantees, understanding the reasons for the service design decisions that were made, identifying constraints and challenges in service delivery, and assessing the quality and responsiveness of the services that were provided. The site visits lasted 2-3 days each and consisted of interviews with program administrators and staff, program participants and recent terminees, and allied community organizations. While on site, field researchers also observed several instances of service delivery (e.g., a classroom or worksite activity) and spoke with those delivering the services (e.g., classroom instructors or worksite supervisors). In selecting the 23 grantees to visit, we developed a stratified random sampling plan that ensured representation of tribal and non-tribal programs, those operating in various regions of the country, large and small programs, and those operating in varying socio-economic contexts.

RESULTS FROM THE ADMINISTRATOR SURVEY

The results from the Administrator Survey are presented in three sections, discussing relationships with the Department of Labor, program goals, and factors affecting clients' success.

Relationships with the Department of Labor

Grantees interact most directly with DOL through DOL's Division of Indian and Native American Programs (DINAP), which provides overall direction and guidance. As part of the Administrator Survey, grantees by overwhelming proportions (over 90%) stated that DINAP clearly communicated program policies while providing enough flexibility for grantees to accomplish their chief objectives. They also gave extremely high marks to the recent partnership initiative instituted by DINAP, finding that it was now a lot easier to "have a say in program policies" and had established an atmosphere of trust and mutual respect. Although the consultation process is thus viewed very favorably overall, a number of respondents suggested that a wider mix of grantees might be invited to participate in various Work Groups and advisory committees.

Among its other duties, DINAP also co-sponsors national and regional training conferences and, through other means, is charged with providing grantees with the technical assistance they need to be effective. Grantees overwhelmingly believe that their training needs are being met through these efforts. The opportunities that grantees have to meet one-on-one with their Federal Representatives are much appreciated, and DINAP staff are widely praised for their helpfulness and timely assistance. The national and regional conferences are similarly viewed very favorably, and the DINAP Bulletins are felt to provide important information. Among vehicles for technical assistance, peer-to-peer exchanges are strongly endorsed.

Despite this very favorable response overall, grantees did make numerous suggestions for how their technical assistance needs could be better met. Suggestions included providing more comprehensive training for new Directors, tailoring workshops at conferences to subsets of grantees (e.g., based on the size of the grant, for reservation vs. urban programs, for more vs. less experienced staff, etc.), providing updated manuals, and improving access to electronic conferencing.

Reporting and performance standards are two vehicles used to ensure accountability. Grantees almost unanimously agree that recent changes to the reporting forms make them easier to use and they believe that the required forms generally cover all information of relevance that needs to be reported. Similarly, DINAP's recent moves to encourage electronic reporting are generally well received, although many grantees are reserving judgement until they see how well the transmission procedures will work in practice. However, an appreciable minority still feel that the reporting forms are too complicated.

Sentiments are more divided on the performance-standards system. Between 70% to 85% of respondents understand the current system of performance accountability and are satisfied with it overall, and believe that it helps them improve their program performance and that the process of adjusting standards is fair. Moreover, two-thirds believe that the current measures of outcomes give enough flexibility for grantees to run their programs as they see fit. At the same time, majorities also feel that the performance-standards system is too complicated, focuses too much on job placements, and does not adequately "reflect the goals of our program."

Thus, although the current system may be something that most grantees can live with and that some even prefer, sentiments are clearly mixed. Accordingly, grantees

had numerous suggestions for improving performance measurement, such as that a wider range of outcomes should be covered, that grantees should be able to "claim credit" for services they provided (and not just outcomes), that measures should be developed relating to learning gains for participants who have not yet terminated, and that grantees should be permitted to develop individually-designed performance measures tailored to their own programs. Some of these suggestions are in line with recommendations recently issued by a Work Group convened by DOL to assist in revamping the current performance measurement system.

Program Goals

Section 401 programs operate in extraordinarily difficult circumstances, and grantees find themselves trying to meet the needs of hard-to-serve program participants in often bleak socioeconomic contexts. Given these circumstances, they must balance diverse program objectives, from providing training that boosts long-term employability, to providing a source of income in the short-run, and from meeting the needs of individual participants, to enhancing the well being of the community as a whole.

These diverse objectives were reflected in responses to the Administrator Survey. Respondents nearly unanimously define their objectives as including quite traditional employment and training functions, such as providing participants with training and helping them find jobs and achieve self-sufficiency. But additionally, majorities also rate helping participants with temporary income and supportive needs as important, as well as providing a sense of community. The importance of community as a program objective is especially important for non-tribal programs, presumably because other community agencies serve this function in areas served by tribally-run programs.

Factors Affecting Clients' Success

In recognition of the difficult circumstances within which Section 401 programs operate, we asked grantees to identify factors that made it difficult for clients to achieve successful outcomes. External constraints cited as being most important were the grantees' lack of funding and a lack of adequate job opportunities in the area. Client characteristics that were noted as among the most formidable constraints included participants' lack of work experience, lack of motivation, problems with substance abuse, family responsibilities, lack of awareness of what it takes to get and keep a job, and lack of necessary life skills. Many clients also are strongly tied to their

communities, which makes them reluctant to pursue job opportunities that may require relocation.

GRANTEE ORGANIZATION AND SERVICE STRATEGIES

The in-depth case studies also provided the opportunity to look at programs' goals and objectives and service strategies, and to understand how they were devised given the constraints of the local context. A content analysis of grantees' goal statements showed a strong service orientation, in keeping with Native American cultural values that emphasize helping and serving others. Other key themes revealed a strong client-centered orientation that often led to a focus on attending to participants' short-term—to some degree instead of their longer-term—needs. In general, however, goal statements are vaguely worded and lack specificity.

An examination of service designs shows again an emphasis on meeting participants' shorter-term needs. Thus, Training Assistance, which is usually designed for short-term goal attainment, is one of the primary services of choice. Work Experience is another service activity that is very heavily used, and this too often reflects an effort to attend to participants' need for immediate income, as well as to provide services to the community that would otherwise be unaffordable. At the same time, service activities with longer-term training objectives were also a key part of the service mix in many programs, including occupational-skills classroom training, on-the-job training, and basic skills classroom training.

Key factors influencing the service designs that individual grantees chose included the lack of job opportunities in many areas, which often led to a reliance on Work Experience and Community Service Employment; weak relationships in some cases with the private sector, due to employers' overt racism or their poor appreciation of Native American cultures, which limited the use of OJT and restricted the range of suitable job placements; the vast geographic scope of many service areas, coupled with limited transportation networks, which minimized access to training providers and job opportunities; and limited and inadequate funding, which fostered a reliance on less expensive interventions.

Limited funding, while thus circumscribing service options to a very real degree, nonetheless also added as a strong impetus for grantees' efforts to link and coordinate with a variety of alternative agencies and funding streams. Indeed, many grantees have for many years made strong efforts to develop a "one-stop" approach to services, and

some have been quite successful in doing so. The specific form these efforts take varies, however. Thus, tribal programs are quite successful at accessing tribal funds or linking with other tribal agencies or programs specially targeted for Native Americans, but often shy away from forging strong linkages with state social service agencies for fear of compromising their tribal sovereignty. By contrast, non-tribal programs are much more likely to link with state agencies and do so quite successfully. Regardless, INA programs in our study have overall done a remarkable job of identifying an array of resources in their communities and accessing them to better meet the needs of their clients.

With respect to staffing, research team members were profoundly impressed with the strong dedication and commitment found among most practitioners. In general, grantee staff were also seasoned veterans, well aware of their communities' needs and available resources. However, some programs have experienced rapid staff turnover. Although new hires can often invigorate a program by bringing an infusion of new ideas, a lack of experience and institutional knowledge can sometimes be a hindrance to effective services.

In any case, grantee staff uniformly understand the fundamental need for "Indian people to help other Indian people" and are strongly motivated along these lines. By the same token, the participants with whom we spoke expressed a strong preference for receiving services from Indian organizations, and indeed many would have avoided seeking assistance otherwise, however dire their needs. This fact suggests the crucial role that Section 401 programs play, especially in urban areas, of fostering community and serving as a critical lifeline for those in alienating surroundings.

SERVICE DELIVERY

In examining the ways in which services were delivered in the 23 case-study grantees, we focused on services in support of training, basic skills and occupational skills classroom training, work experience and community service employment, and training assistance and placement services.

Services in Support of Training

Under this topic we considered the ways in which grantees targeted participants for services and carried out outreach and recruitment, conducted assessment and service planning, performed case management functions, and provided participants with stipends and supportive services.

With respect to targeting and recruitment, most grantees avoid establishing specific targeting goals because they felt that all eligible INA applicants could be considered hard to serve and in need of assistance. For these reasons, grantees were reluctant to give priority to some individuals over others. In cases where targeting was an explicit goal, grantees focused on segments of the population deemed "most in need" by developing specific recruitment procedures, such as implementing a "no-repeaters" policy. While case study grantees reported little difficulty in meeting their enrollment goals, most relied heavily on indirect recruitment methods, such as word-of-mouth referrals or referrals from other agencies, although more proactive methods (e.g., advertisements, announcements at community events, job fairs, etc.) were also sometimes used. In some cases, an over-reliance on word-of-mouth referrals led to inadvertent targeting, whereby individuals with well-developed networks in the community could readily access services, while others who were not as well connected found out about the program only after an unwelcome delay.

Assessment practices varied widely because of differences in the backgrounds and needs of participants. Thus, participants seeking training to improve their longer-term employability were often assessed carefully, including an examination of their basic skills proficiency, occupational aptitudes and interests, and supportive service needs. Meanwhile, those desiring an immediate job referral were assessed much more quickly and simply. To this degree, most grantees were careful about tailoring assessment activities to individual circumstances. However, even where extensive assessment was conducted, grantees were often constrained in developing fully effective service strategies, because clients often had strong opinions about what services they wanted and needed in the short-run, often to the detriment of their longer-term needs. Typically, therefore, service planning was driven by clients' interests in obtaining immediate employment (subsidized or unsubsidized) and their need for immediate income. Additional constraints included grantees' limited budgets and challenges posed by the service areas, such as the lack of transportation and the limited availability of service providers.

Case management services in general were conducted as one-on-one counseling, though sometimes a team approach was used. In any case, case managers were genuinely caring and dedicated. We found many instances in which case management activities were carefully planned and well executed, and often grantee staff went to extraordinary lengths to ensure that their clients' needs were met. Similarly, some

grantees devised strategies that entailed maintaining frequent communication with instructors, worksite supervisors, and other service provider staff to identify clients' needs early and intervene appropriately. However, large case loads caused by limited resources, as well as geographically vast service areas, sometimes made case management difficult. Given these constraints, case managers often targeted their attention on participants facing difficulty or those just starting training, sometimes at the expense of those who appeared to be doing well.

Basic Skills and Occupational Skills Classroom Training

Nearly all programs offered classroom training of some type, but generally the emphasis was on occupational skills classroom training (OSCRT) rather than basic skills classroom training (BSCRT). Indeed, BSCRT was the service activity least common in the case study sample and was a service received by relatively few program participants, despite the fact that high school dropouts and those with low basic skills constitute a sizable part of the INA program's client pool. Part of the reason for the relative inattention given to BSCRT is that grantees often refer those interested in such training to adult basic education or GED programs run by other tribal departments or social service agencies, without enrolling them in JTPA.

The relatively few instances of BSCRT that we were able to study were conducted by the grantee itself, rather than a separate service provider. Computer-aided instruction was common, but some programs used a workbook-exercise format. In either case, diagnostics conducted at the outset identified in which skills the participant was deficient, and instruction was oriented accordingly. Among the clear strengths of the examples we studied, all were open-entry and open-exit and emphasized self-paced learning geared to each student's own areas of skill deficiency.

Weaknesses included the fact that learning was usually decontextualized and opportunities for participatory learning or active learning methods were uncommon. Most importantly, due to limitations of funding, instructors in several of the programs were only available sporadically, so that supervision and mentoring were often not as intensive as would have been desirable. Such a loosely structured instructional format meant that only students who were strongly self-motivated tended to make steady progress. By contrast, in programs with greater structure and where instructors were continuously present and held students to high expectations, success rates were much more impressive.

In contrast to basic skills training, OSCRT was quite prevalent. Providers included state or tribal community colleges, private schools and colleges, and vocational-technical schools. Course offerings at these institutions were broad in scope, encompassing degree and certificate programs in myriad vocational fields, including Food Services, Child Care, Respiratory Therapy, Nursing, Graphic Arts, Welding, Business and Information Processing, and many others. Courses of study ranged from those lasting a few weeks to one or two years. Participants usually had a high school degree or GED at entrance, were generally required to have sound basic skills, and were typically highly motivated; thus they could be considered the cream of the JTPA crop. By implication, few provisions were in place for providing access to OSCRT for those who were less well prepared.

The examples we studied were almost uniformly of high quality. Learning objectives were usually well specified, and curricula were practical, applicable, and focused on the development of specific skills needed in a work setting. Subsidiary instruction often focused on important ancillary skills, such as leadership, diligence, communication and problem-solving skills, and goal setting, and Native American cultural elements were also sometimes a part of the instruction. Active teaching methods and contextual learning were predominant; thus instruction was "hands on" and students were "learning by doing," engaged in projects related to real-world or simulated work settings, and worked in teams with their classmates. Instructors strive to remain current, and designed their courses with employers' needs in mind. They also exhibited high levels of professionalism and competence, and, whether Indian or non-Indian, showed dedication, sensitivity, and a strong caring attitude to program participants.

On-the-Job Training

On-the-job training was used by 14 of our 23 case study grantees, but was used extensively by only a few programs. Surprisingly, tribal grantees were somewhat more likely to make use of OJT than non-tribal programs, and, due to the dearth of private-sector employers, job assignments were often with tribal or other public agencies.

Grantees identified several advantages of OJT, including its potential for leading to long-term employment, providing participants with solid job skills that would be transferable to other work settings, and supporting community economic development in Indian-operated businesses and agencies. However, grantees also noted what they felt to be OJT's drawbacks, including its relatively high cost and the potential for

employer abuse, which caused them to limit the extent to which it was used. Moreover, in some communities it was difficult to recruit employers to participate, either because there were few employers in the community to begin with or because of overt or covert racism. Finally, tribal grantees often needed to obtain approval for OJT contracts from tribal officials, and this sometimes led to lengthy delays.

Among grantees who used OJTs, two approaches were common. In the first approach, grantees developed individual OJT assignments with diverse employers, typically for program participants who already had basic work maturity skills, adequate basic skills, and usually some relevant rudimentary job skills and appropriate career interests. In such cases, the specifics of the OJT arrangement needed to be individualized to the employer's and participant's circumstances, including the length of the contract, the participants' working hours, and the training plan; doing so proved to be extremely time consuming but, when well done, led to a high quality training and work assignment.

An alternative approach that some grantees used was to develop multiple OJTs with a few employers or with targeted industries, in some cases to support local economic development initiatives or tribal enterprises (e.g., tourism or gaming). These might take the form of simultaneous group OJT assignments or a steady sequence of individual participants being assigned with the same small number of employers over time. In any case, grantees using this strategy found that a single training plan could be developed as a "template," into which, with only small adaptations, the names of individual participants could be inserted in turn. In this way, substantial efficiencies could be realized. Because multiple OJTs were being developed from the same model, great care was usually taken in ensuring that the template was well developed. At the same time, grantees needed to guard against being overly formulaic or failing to adapt the work assignment to the needs of the individual participants.

Regardless of which approach was being used, high quality OJTs required that grantees work to develop good relationships with employers, be sure that participants were assigned to positions that matched their interests and abilities, work with employers and participants to develop meaningful training plans, adjust the length of the OJT contract to the amount of training to be provided, and monitor worksites to be certain that high quality training actually occurred and that participants were adequately supervised and transitioned to permanent employment. When evaluated against these criteria, we found that the quality of the OJTs we studied was mixed. In many cases,

the OJTs were carefully selected and monitored and the grantee took great pains in ensuring that quality training was being provided in skills in which the participant was deficient. In other cases, however, the work assignment was poorly matched to the participants' interests and skills and the training plan amounted to little more than a job description.

Work Experience and Community Service Employment

Work Experience (WEX) and Community Service Employment (CSE) provide opportunities for participants to acquire hands-on work experience and skills training, while also gaining immediate income. In general, WEX is used for entry-level workers, while CSE is used for those with more experience. In some cases, for example, participants start out in WEX but switch to CSE when they have reached WEX's 26-week limit. Beyond these differences, there is substantial overlap between these activities with respect to the types of positions in which participants are placed and the training and community objectives associated with the work assignments.

WEX is among the most commonly used service options and is used by grantees in very diverse ways. Its objectives include providing participants with an introduction to the work world or a specific career, teaching occupational skills, providing immediate income, boosting self-esteem, and facilitating the transition to placement in unsubsidized employment. In some cases, it is used as a stand-alone activity, while elsewhere it is used in conjunction (either sequentially or concurrently) with another service activity, such as classroom training. In some instances, it is used as a short-term or stopgap measure to provide participants with needed income while they undergo job search, complete training, or gain an exposure to the world of work; in other cases, it is used, along with CSE, to provide long-term work assignments for individuals, often up to the allowable time and budget limits. This very diversity is part of the reason for the high frequency of use of subsidized employment in the INA programs we studied. Additionally, this activity often makes the most sense on reservations marked by an absence of economic development and with limited opportunities for unsubsidized employment, where direct placements and OJTs are impractical and classroom training cannot be very easily motivated.

In addition to meeting the needs of the participants for income and training, WEX and CSE are used very explicitly to advance community and tribal interests, especially in the face of such economic conditions. Very commonly, tribal agencies come to depend on subsidized labor provided by the JTPA program to meet their staffing needs,

including running tribal government offices, Indian Health Services, tribally run day care centers, and even the JTPA office itself, among others. Subsidized employment thus becomes a way in which the tribe could provide valuable social services to the community that it often could not otherwise afford. In some cases, too, the use of JTPA-funded subsidized employment had become so institutionalized that it was used to screen and train potential new hires when job vacancies for unsubsidized employment in tribal agencies occurred. Thus, tribal members who aspired to full-time permanent employment with the tribe knew that the likeliest bet was to first become a JTPA participant and accept a WEX or CSE assignment.

Given the great variety of ways in which subsidized employment is used and the myriad individual and community objectives that grantees needed to balance, it is difficult to unambiguously identify criteria for high quality program designs. However, grantees did not always ensure that participants' training objectives were well articulated or that they were well matched for the positions in which they were placed, even for WEX and CSE assignments that were of substantial duration. Instead, meeting the community's need for subsidized employment and the participants' needs for immediate income often held sway. In any case, participants clearly appreciated the opportunity to work in an Indian-affiliated agency for and with their own people.

Training Assistance and Placement and Post-Termination Services

Services identified under this heading include career counseling, job development, job search assistance, instruction in pre-employment and work maturity skills, job referral and placement services, and vocational exploration. All grantees provided these services to participants, either as stand-alone activities or in conjunction with other training or subsidized employment, and most participants could be said to have received training assistance (TA) of some sort.

Because TA was such a pervasive activity, facilitating access for participants who were geographically dispersed was a continual challenge. Grantees met this challenge partly by outstationing staff at other tribal agencies; however, due to what was sometimes a reluctance to work too closely with non-Indian agencies, linkages with the local workforce development systems (e.g., One Stop) were rarely very well developed. An additional strategy that is just starting to emerge is promoting self-access services, where (for example) jobs can be searched for electronically; grantees' hesitancy in embracing this approach, however, stems from their reluctance to give up the personalized approach to services that is so much a hallmark of the INA program.

Providing TA in a way that reflects the cultural context and Native American values and customs was a particular strength of the INA programs that we studied. Along these lines, grantees adopted a holistic approach to services and typically placed the family and community at the center of services, rather than just the individual participant. Thus, grantees attended to participants' entire physical and emotional well-being, and not just their needs for career guidance and job placement assistance. Similarly, counseling included attention to the well-being of the family as a whole, including health care needs, emotional attachments, and the like.

As a demonstration of cultural sensitivity, grantees also made a particular effort to cultivate listing of jobs in which Native American participants could feel comfortable. For this reason, grantees often emphasized making job referrals in Indian-owned or operated businesses or agencies. Being referred for employment to a firm that provided a comfortable and welcoming environment was something in which many participants clearly placed great value. At the same time, the focus on providing job referrals sometimes caused programs to neglect developing participants' job search skill, which would promote their longer-term self-sufficiency. Moreover, the emphasis on referrals in Native American businesses sometimes came at the expense of referrals with non-Native American firms that might have paid more or were more conveniently located. Thus, grantees need to balance participants' desire for placements in environments in which they can feel more comfortable with their desire for placements in jobs that pay well, offer the opportunity for advancement, have favorable fringe benefits, and match their career interests. Helping participants adapt to non-Indian work settings, and helping non-Indian employers be more sensitive to the needs of Indian workers, were strategies that some grantees used to better balance these objectives.

FACTORS INFLUENCING SERVICE DESIGNS

A number of factors again and again emerged as key influences on grantees' service designs. These factors include the overall inadequacy of funding, which severely limits the number of persons who can be served, from among the much larger number who are program eligible and in need of assistance. Lack of funding also constrains grantees' decisions about the types of services that participants are provided. Along these lines, recent reductions in JTPA funding have caused many grantees to shift towards lower cost service alternatives, such as Training Assistance, and away

from Classroom Training and Work Experience; it has also caused them to limit the amounts of supportive services that are provided.

The absence of job opportunities in many Indian communities was another key constraint on service design and delivery. Without a reasonable prospect for placing many participants in unsubsidized employment, grantees needed to make difficult decisions about how best to use their employment and training funds, and often found that it was difficult to convince participants to undertake long-term skills training. Compounding the dilemma, clients' consistent and clear preferences for remaining within the Indian or tribal community further limited choices. Fortunately, in some tribal settings, the introduction of gaming or other successful economic development efforts have served to open up additional employment opportunities.

In light of these and other constraints, grantees were overall fairly effective. Among the most notable elements was their holistic approach to services and the overwhelming commitment and dedication of program staff.

SUMMARY OBSERVATIONS

At the level of federal oversight and policy, the Department of Labor has over the last several years made enormous strides in forging a strong partnership with the grantee community. Although the degree of cooperation evidenced in the DOL-grantee relationship has waxed and waned over the past decades, a fundamental underlying sense of mistrust, even antagonism, has characterized their interactions. DINAP's outgoing chief, Mr. Thomas Dowd, who is himself a former grantee director, has worked hard to dispel suspicion and forge a constructive dialogue. Although some grantees remain wary, the last several years have as a consequence witnessed a major transformation in the way DINAP is perceived. To an extent unforeseen only a few years ago, grantees now feel a sense of ownership towards "their" program and are working cooperatively with DINAP on all matters affecting program policy. Based on this foundation, the INA program is now well positioned to develop a sound future under the new Workforce Investment Act.

In terms of service design and delivery, this future will doubtless reflect the unique role that INA programs play in the employment and training system and the many special strengths that were in evidence among the programs we studied. To begin with, INA grantees epitomize the holistic approach to services. Programs we studied were inordinately conscious of viewing clients as whole people rather than as instances

of symptoms to be treated. This approach often extended to a consideration of the needs of other members of the participant's family and the ways in which family dynamics needed to be taken into account to promote the individual's own success.

The notion of holistic services was expanded as well to the conceptualization of the grantee community as a constituency in its own right and as an important beneficiary of the services that were being provided to individuals. Thus, grantees sometimes needed to strike a balance between deciding how to meet the needs of individuals for employment and training assistance while ensuring that the community's own larger interests were being advanced as well. The ways in which Work Experience and Community Service Employment are used clearly exemplify this.

The importance of community surfaced in another way as well, particularly for programs operating away from a tribal setting. In such environments, participants (and potential participants) often feel estranged and alienated from the mainstream culture and look to the organization operating the Section 401 grant as providing a needed sense of belonging. Moreover, participants take great comfort in knowing that their needs for assistance can be met by program staff that share a common ethnic identity as Native Americans and are sensitive to tribal cultures. So important is this shared identity that many participants would not avail themselves of similar services that might be made available from a non-Native American organization.

For their part, grantees, again particularly those in non-tribal settings, become a focal point for community identity. As such—and, again, reflecting their holistic approach to services and their focus on meeting individual as well as community needs—they use funds from a variety of sources to organize cultural activities and events, promote native arts and crafts, run programs for senior citizens, operate Food Banks for the needy, publish community newsletters, and the like. The strong sense of community engendered by these efforts is largely irreplaceable and constitutes one of the strongest aspects of the uniqueness of the INA program. Although many of these subsidiary efforts rely on non-401 funds and a strong spirit of volunteerism, the JTPA allocation constitutes the bedrock of grantees' funding and thus must be viewed as the foundation of these myriad efforts.

Grantees operating in tribal settings, by contrast, to a lesser degree serve as the community's focal point, because other tribal agencies and institutions can play this role. Instead, the JTPA program must be viewed as constituting an integral cog in a

wider network of services developed from other funding streams, used in tandem to meet the needs of individuals and the community.

The above considerations suggest the importance of evaluating the INA program in context. The importance of context is suggested as well by the fact that grantees are operating their programs in extraordinarily diverse and often extremely difficult circumstances, typically with very limited funding. For example, service areas in many instances are marked by high rates of joblessness, physical isolation, and extreme economic deprivation. Fashioning an employment and training program in such circumstances poses special challenges and gives rise to difficult decisions regarding how a job training program should focus its energies in the face of a dearth of unsubsidized job opportunities of any kind.

The importance of context suggests that it is very difficult to analyze specific aspects the Section 401 program (such as specific training activities) in isolation. In a real sense, in fact, the value of the program is much greater than the sum of its component parts. Thus, specific activities or services, when viewed in isolation, often seem unexceptional, but the INA programs taken as a whole play a critical role in promoting the vitality and well being of Indian and Native American individuals and communities.

RECOMMENDATIONS

Based on our intensive examination, we are convinced of the critical role that the INA program plays for the people and communities that they serve. We applaud the efforts of those grantees who design and deliver quality services in the face of inordinately difficult challenges.

At the same time, we have drawn on our study's findings to formulate a number of recommendations, which we have formulated at the level of federal policy and practice and the level of the grantee service design and delivery.

Federal Policy and Practice

1. *DOL must take seriously, as it has begun to do over the last several years, its obligation to work in partnership with the grantee community.* Recent initiatives undertaken by the Division of Indian and Native American Programs (DINAP), in conjunction with the Division of Performance Management's Office of Policy and Research (OPR), have been successful in enabling grantees to feel ownership of their program. DOL and grantees are now negotiating in a spirit of openness and cooperation to make important decisions about the program's operation and future

direction. Given that Mr. Dowd recently stepped aside as the Chief of DINAP, DOL needs to ensure that his successor is as committed to dialogue and partnership as he was. The initiatives that Dowd began should not be allowed to falter.

2. *DOL needs to ensure that all grantees have the opportunity to participate in the partnership initiative.* Results from our Administrator Survey suggest that some grantees, while applauding the partnership initiative, feel that they have not had full opportunity to participate. Although Work Groups and advisory bodies can understandably include just handfuls of members, DOL should ensure that all grantees have ample opportunity to express their opinions on matters affecting the program. Where it would not be too disruptive, Work Group or partnership bodies should include provisions for rotating memberships, and efforts need to be made to see that all grantees, including tribal and non-tribal programs and those that are large and small, are well represented. DOL's recent initiative to promote Internet access for all grantees may provide an additional vehicle for giving all grantees the chance to participate in a dialogue.

3. *DOL needs to work with grantees to ensure that new regulations for the Section 401 program are clear, concise, and grant ample flexibility to grantees to design and operate their programs in accordance with the needs of their communities.* The recently enacted Workforce Investment Act (WIA) of 1998 supplants JTPA, but still allows a provision for a separate, national Indian and Native American Program. Doubtless, DINAP will need to craft new regulations for the program under WIA. In keeping with recommendations expressed above, new regulations should be developed with the full cooperation of the grantee partners. In recognition of the great diversity of contexts within which the INA program operates, we recommend that these regulations permit ample flexibility to grantees for designing programs that are responsive to local needs. Overly restrictive provisions on service designs that are not statutorily mandated should be avoided. Any new regulations, as well as all other DOL issuances (e.g., DINAP Bulletins), should also be written with any eye to simplicity and clarity.

4. *The new regulations need to permit WIA funds to be used to promote diverse individual and community needs, including economic development if possible.* Lack of adequate job opportunities and weak economies are among the biggest obstacles Section 401 grantees face in accomplishing their program objectives. Given these circumstances, concerted efforts should be made to spur economic development in Native American communities. The JTPA Amendments of 1992 placed severe restrictions on the use of JTPA funds for economic development activities, effectively eliminating a promising Community Benefits Projects (CBP) initiative that had previously been permitted in the INA program.[1] To the extent that it is allowable under WIA, we encourage DOL to consider reinstating provisions for

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[1] The provisions of CBP allowed grantees to use a limited amount of their JTPA funds to engage in workforce development and training in the context of promoting local economic development.

Community Benefits Projects, or similar initiatives to allow WIA funds to be used to promote, or in conjunction with, economic development efforts.

5. *DOL should forge ahead with plans to revamp the performance standards system for the INA program, to reflect the wide diversity of grantees' circumstances and accomplishments. At the same time, it must be careful to ensure adequate accountability at the national level.* Grantees are clearly ambivalent about the current performance measurement system. Although the current measures are generally perceived as being reasonable and fair, many grantees also feel these measures do not fully reflect their programs' chief accomplishments. Thus, DOL's recent efforts to work in partnership with the grantee community to develop a revised performance-standards system seem wholly appropriate. The recent enactment of the Workforce Investment Act should not delay these efforts.

The twin themes of this new legislation are, on the one hand, to devolve substantial authority for decision-making to local programs, and, on the other, to ensure that local programs are held strictly accountable for their performance. In keeping with these themes, DOL needs to ensure that new performance measures (as well as program regulations in general) impart substantial flexibility, while at the same time ensuring that adequate accountability mechanisms are in place. This will require that any new performance-standards system provide meaningful and substantial measures of accountability. Additionally, the new measures need to be supported by an adequate reporting vehicle that includes clear definitions of key terms and the valid and reliable measurement and reporting of key concepts.

6. *DOL needs to ensure that additional attention is paid to the needs of grantees for technical assistance and training, especially those who are new Directors, and that grantees have adequate opportunity to engage in dialogue with their peers and DINAP's Federal Representatives.* Any new flexibility imparted under WIA implies as well that grantees be provided with sufficient opportunities to learn how to take advantage of that flexibility by designing effective and innovative services. Along these lines, although the technical assistance and training (TAT) that has been provided heretofore has been adequate overall, certain segments of the grantee population, especially new Directors, need additional assistance.

In general, capacity building also needs to be promoted, and grantee staff should have the opportunity to build their skills in all areas. Assessment is a particular area in which programs might benefit from additional capacity in the years ahead. Participants will increasingly need to improve their skills to compete in the labor market; schools' and employers' expectations and requirements have risen over the past decade and will continue to place more importance on excellent academic and workplace skills into the next century. In this context, a careful assessment should be the foundation upon which participants' services are based. Without a thorough knowledge of participants' interests and abilities, service plans can be made based only on a general feeling for the clients' capabilities and long-term needs, and thus risk missing the mark. Given this, staff will need to have training on how best to access assessment results and how to interpret them.

Grantees could also benefit from additional efforts to learn about what their colleagues are doing, including through peer-to-peer exchanges. DOL should also continue its recent efforts to ensure that grantees have adequate opportunity to meet individually with DINAP's Federal Representatives.

Grantee Service Design and Delivery

7. *To ensure a more equitable access to services, grantees should avoid an over-reliance on word-of-mouth referrals. For the same reason, they need to make provisions for reaching potential applicants throughout their service areas, through outstationing staff and forging partnerships with other social service agencies.* Outreach and recruitment efforts currently being undertaken are clearly adequate for ensuring a constant flow of participants. However, some grantees rely almost exclusively on indirect recruitment methods, especially word-of-mouth referrals, and this has sometimes made it difficult for potential applicants who are less well connected in the community to be made aware of services. Thus, some participants with whom we spoke, who eventually heard about the program through a friend or relative, told us that they wished they had learned of the program's existence years earlier.

   An additional difficulty that grantees experience in ensuring an equitable access to services is in reaching potential participants throughout the entirety of the grantees' service areas. Achieving this objective is an especially difficult challenge for those grantees serving physically vast territories but who find it financially infeasible to establish separate field offices, due to their very limited funding. In such cases, grantees can follow the lead of many of their colleagues who outstation staff, use roving recruiters, and develop effective joint referral linkages with other social service and tribal programs. As the new WIA legislation takes hold, linkages with the nation's emerging One-Stop systems can be an especially promising practice that is rife with opportunity, as a few grantees have already demonstrated. Thus far such linkages appear to be much underutilized.

8. *While grantees need to attend to participants' immediate needs for income and employment, they need to address clients' longer-term needs as well.* We found that clients often had strong opinions about what services they wanted and needed in the short-run, typically including obtaining immediate employment (subsidized or unsubsidized), driven by their need for immediate income. Consequently, Section 401 grantees often emphasized addressing participants' shorter-term needs, sometimes to the neglect of their longer term needs, and resulting in quick-fix solutions and a "revolving door" approach to services. We recognize that grantees often find themselves severely constrained by limited budgets and other factors. We also appreciate that they must be responsive to the expressed preferences of their clients. To the fullest extent possible, however, grantees should promote long-term solutions and structure service strategies to advance participants' longer-term interests while attempting to address their needs in the short run. Suggestions for how to do so are embedded in some of the recommendations that follow.

9. *Grantees who are not located in reasonable proximity to service providers for Classroom Training should consider utilizing distance learning or alternative delivery vehicles.* Extreme physical isolation is a major impediment to making the full-range of classroom training services available to participants, at least among some grantees. Alternative or innovative service delivery vehicles can be pursued in these circumstances, including distance learning or other on-line classroom services. The greater access to technology among both grantees and participants will make this more and more feasible.

10. *Grantees need to ensure that On-the-Job Training is accompanied by a clear training plan, specifying the specific skills the participant is expected to learn, and in fact provides training opportunities commensurate with the employers' wage reimbursements.* On-the-job training (OJT) has great potential as a service activity in imparting meaningful skill gains and leading to permanent employment, and to this degree can clearly be said to address participants' longer-term, as well as short-term, needs. However, to realize this potential to the fullest, grantees must ensure that the participant's training plan is clearly specified, that the work assignment imparts meaningful skills that are transferable across employers, and that the employer provides adequate supervision and mentoring. Moreover, grantees should have the expectation that employers will continue to hire the trainee once the training period has ended, and limit their involvement with employers who fail to do so. Many of the OJTs we studied exemplified these characteristics, but many others did not. Grantees should ensure that all OJTs attempt to promote high-quality design principles.

11. *Work Experience assignments of substantial duration should also be structured to provide real and meaningful training.* Work Experience (WEX) serves very diverse objectives and is used by grantees in very different ways. In some cases, WEX is deliberately and appropriately structured as a short-term or stopgap work assignment, as when participants are given short-term WEX positions while undergoing job search or as a way of providing exposure to the world of work and boosting self-esteem. Very often, however, WEX assignments are of substantial duration (e.g., up to the 6-month limit). In these cases, grantees should ensure that training objectives are clearly specified and the participants' are learning valuable occupational skills. By doing so, grantees can again promote participants' long-term needs for quality skill development, as well as their short-term need for immediate income.

12. *For participants interested simply in direct placement assistance, grantees need to ensure that they provide not only job referrals, but also that they build participants' job search skills.* Section 401 grantees very appropriately often provide direct placement assistance. In doing so, they should avoid simply giving job referrals, especially when participants seem to lack good job search skills. In such cases, grantees that provide training in job search skills boost participants' self sufficiency and empower them to seek and find their own jobs in the future, minimizing their subsequent need for the program's assistance.